

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CAUSE NO. 4:17-CR-9
	§	Judge Crone
THEODORE WILLIAM TAYLOR (1)	§	
CHIA JEAN LEE (2)	§	

**NOTICE OF INTENT TO OFFER EVIDENCE UNDER  
FEDERAL RULE OF EVIDENCE 404(b)**

The United States of America, by and through the undersigned Assistant United States Attorney, hereby gives notice under Federal Rule of Evidence 404(b) of the Government's intent to offer the following evidence at trial:

1. Evidence relating to Defendant Theodore William Taylor's licensure status and disciplinary history with the Texas Medical Board.

The Government believes this evidence is admissible on other grounds, including because it is "intrinsic to" and "inextricably intertwined with" the unlawful acts described in the Indictment. However, as a precautionary measure, and in the alternative, the Government provides notice of its intent to offer the evidence under Rule 404(b) as well. The Government previously produced that evidence to Defendants in discovery.

Respectfully submitted,

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

/s/ Stevan A. Buys

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**CERTIFICATE OF SERVICE**

I certify that on September 24, 2018, a true and correct copy of the foregoing document was electronically filed and that counsel of record will receive a copy thereof via the District Clerk's CM/ECF system.

/s/ Stevan A. Buys

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STEVAN A. BUYS